

# EXHIBIT B

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

SEARS HOLDING CORPORATION

Debtor

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Case No. 18-23538


Chapter 11

**OBJECTION TO PROPOSED NOTICE OF CURE COSTS  
"CURE OBJECTION"**

Grand Central Plaza, LLC objects to the proposed Cure Costs set forth in the Supplemental Notice of Cure Cost and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in connection with Global Sale Transaction based upon the following:

1. Grand Central Plaza is lessor of the Kmart Store 7065 located in Horseheads, New York. ☒
2. Grand Central Plaza objects to the proposed cure amount of "0".
3. The Proposed Cure Cost is \$55,546.27 as is set forth in the attached tax bills.

Dated: January 32, 2019

  
**DAVIDSON FINK, LLP**  
Glenn M. Fjermedal, Esq.  
David L. Rasmussen Esq  
Attorney for Grand Central Plaza, Inc.,  
28 East Main Street, Suite 1700  
Rochester, New York 14614  
Tel.: (585) 756-5954



## Grand Central Plaza, Inc.

Commercial/Industrial Development

1020 Center Street, Suite 4  
Horseheads, NY 14845  
Phone: 607-737-5233  
Fax: 607-732-4667  
Web site: www.yunisinc.com

October 30, 2018

Sears Holdings Corp.  
Property Tax Dept.; B2-110A  
3333 Beverly Road  
Hoffman Estates, IL 60179

Re: Kmart Store #7065, Grand Central Plaza, Horseheads, New York

### 2018-2019 Horseheads Central School Taxes

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#### Tax On Expansion

Assessed Value of Expansion	\$533,740.00
2018-2019 School Tax Rate (per thousand)	<u>18.925282</u>
Tax on Expansion	\$ 10,101.18

#### Tax Before Kmart Expansion

Tax on Entire Plaza	\$110,264.37
Less: Tax Attributable to Kmart Expansion	\$ 10,101.18
Less: Tax Attributable to Dunkin Donuts	<u>\$ 8,415.39</u>
Tax Before Kmart Expansion	\$ 91,747.80
K-Mart 1969 School Base	<u>\$ 21,360.90</u>
Excess over Base	\$ 70,386.90
Kmart Prorata Percentage	<u>0.297500</u>
Kmart Tax Before Expansion	\$ 20,940.10

#### Summary

2018-2019 School Tax on Expansion	\$10,101.18
2018-2019 School Tax on Original Building	<u>\$20,940.10</u>
<b>Total Due</b>	<b><u>\$31,041.28</u></b>

Receipted Tax Bill Enclosed

#### **Please Mail Remittance To:**

Grand Central Plaza, Inc.  
1020 Center Street, Suite 4  
Horseheads, New York 14845

*1.5% Per Month Finance Charge Will Apply On All Statements 30 Days Past Due*



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January 30, 2019

Kmart Corporation  
c/o Sears Holdings Corporation  
Attn: Vice President, Lease and Development Department 824RE  
3333 Beverly Road  
Hoffman Estates, IL 60179

Cc: Kmart Corporation  
c/o Sears Holdings Corporation  
Attn: Vice President, Real Estate Law and Asset Management Department 824RE  
3333 Beverly Road  
Hoffman Estates, IL 60179

Re: K-Mart Store #7065  
Grand Central Plaza, Horseheads, New York

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K-Mart's Share of Insurance Reimbursement

November 30, 2017 - November 30, 2018 Policy Year

Property	\$70,877.88
Liability - Plaza	<u>\$16,166.00</u>
	\$87,043.88
	<u>x 36.75%</u>
	\$31,988.63
	<u>x 27%</u>

**Total Due: \$ 8,636.93**

Insurance Copy Enclosed

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January 30, 2019

Sears Holdings Corp.  
Property Tax Dept.; B2-110A  
3333 Beverly Road  
Hoffman Estates, IL 60179

Re: K-Mart Store #7065 - Grand Central Plaza, Horseheads, New York  
2019 Town and County Tax

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Tax On Expansion

Assessed Value of K-Mart Expansion	\$533,740.00
2019 Town and County Tax Rate	<u>10.611947</u>
Tax On Expansion	\$ 5,664.02

Tax Before K-Mart Expansion

Tax On Entire Plaza	\$ 61,958.97
Less: Tax Attributable to K-Mart Expansion	\$ 5,664.02
Less: Tax Attributable to Dunkin Donuts Building	<u>\$ 4,718.75</u>
Tax Before K-Mart Expansion	\$ 51,576.20
K-Mart Town and County Base	<u>\$ 17,276.89</u>
Excess Over Base	\$ 34,299.31
K-Mart Prorata Percentage	<u>0.297500</u>
K-Mart Tax Before Expansion	\$ 10,204.04

Summary

2019 Town and County Tax On Expansion	\$ 5,664.02
2019 Town and County Tax on Original Building	<u>\$ 10,204.04</u>

**Total Due** **\$ 15,868.06**

Receipted Tax Bill Enclosed

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Horseheads, New York 14845

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

SEARS HOLDING CORPORATION

Debtor

Case No. 18-23538

Chapter 11

STATE OF NEW YORK)  
COUNTY OF MONROE )

AFFIDAVIT OF SERVICE

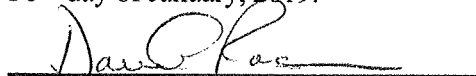
I, Victoria Billups, being sworn say:

I am not a party to this action, am over 18 years of age and reside at Rochester, New York. On

January 30, 2019, I served the **OBJECTION TO PROPOSED NOTICE OF CURE COSTS**  
“CURE OBJECTION” by depositing a true copy thereof, enclosed in a post-paid wrapper, in an  
official depository under the exclusive care and custody of United States Postal Service within  
New York State, addressed to each of the following persons at the last known address set forth  
after each name. (See attached list)

  
VICTORIA BILLUPS

Sworn to before me this  
30<sup>th</sup> day of January, 2019.

  
Notary Public

DAVID L. RASMUSSEN  
NOTARY PUBLIC, State of New York  
Qualified in Monroe County  
Registration No. 02RA6254495  
Commission Expires January 17, 2020

**SERVICE LIST**

Chambers of the Honorable Judge Robert D. Drain  
United States Bankruptcy Court for the Southern District of New York  
300 Quarropas Street, Room 248  
White Plains, New York 10601

c/o Sears Holdings Corporation  
3333 Beverly Road  
Hoffman Estates IL 60179  
Attn: Stephen Sitley Esq., and Luke J. Valentino, Esq

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Ray C. Schrock, P.C., Jacqueline Marcus, Esq., Garret A. Fail, Esq., and Sunny Singh, Esq.

Office of the United States Trustee for Region 2  
201 Varick Street, Suite 1006  
New York, New York 10014  
Attn: Paul Schwartzberg, Esq.

Skadden, Arps, Slate, Meagher & Flom LLP  
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Attn: Paul D. Leake, Esq., Shana A. Elberg, Esq., and George R. Howard, Esq.

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Attn: Marshall S. Huebner, Esq. and Eli J. Vonnegut, Esq.

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2 Wall Street  
New York, NY 10015  
Attn: James Gadsden, Esq.

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One Liberty Plaza, New York, NY, 10006  
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101 Park Avenue  
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Attn: Eric R. Wilson, Esq., Benjamin D. Feder, Esq., and T. Charlie Liu, Esq.

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620 Eighth Avenue  
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Attn: Philip C. Dublin, Esq., Ira Dizengoff, Esq., and Sara Lynne Brauner, Esq.

Choate, Hall & Stewart LLP  
Two International Place  
Boston, MA 02110  
Attn: Kevin J. Simard, Esq. and Jonathan Marshall, Esq.

Lazard Frères & Co., LLC  
30 Rockefeller Plaza  
New York, New York 10112  
Attn: Brandon Aebersold and Levi Quaintance

Transform Holdco LLC c/o ESL Partners, Inc.  
1170 Kane Concourse, Suite 200  
Bay Harbor Islands, FL 33154  
Attention: Kunal S. Kamlani and Harold Talisman